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Our File No.
20986-104

April 17, 2015

By ECF

Honorable Richard K. Eaton
United States Court of International Trade
One Federal Plaza
New York, New York 10278-0001

**Re: Automobile Club of New York, d/b/a AAA New York
and AAA North Jersey, Inc. v. Port Authority of New York and New Jersey,
No. 11 Civ 6746 (RKE) (HBP)**

Dear Judge Eaton:

We represent Plaintiffs AAA Northeast (formerly Automobile Club of New York d/b/a AAA New York) and AAA New Jersey, Inc. in the above-captioned action. By Order dated March 12, 2015 (Doc. No. 140), the Court ordered that the deposition of former Port Authority of New York and New Jersey ("Port Authority") Chairman David Samson be taken by April 30, 2015.

This letter is respectfully submitted to request that the time to take Mr. Samson's deposition be extended by sixty days, to June 30, 2015. The reason for the requested extension is that AAA's objections to Magistrate Judge Pitman's Order concerning documents withheld by the Port Authority on deliberative process grounds are pending before the Court. Depending on the outcome of the Court's decision on the pending objections, the Court may order production of additional documents. Such documents may be used as exhibits for Mr. Samson's deposition, and questions posed to Mr. Samson may be informed by such documents. The requested extension is for sixty days because we have been advised that Mr. Samson will be out of town and unavailable from mid-May through mid-June.

Counsel for defendant Port Authority and for Mr. Samson have indicated that they do not oppose the requested extension.

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We thank the Court for its consideration of this matter.

Respectfully submitted,

A handwritten signature in cursive script, reading "Kevin P. Mulry". The signature is written in dark ink and is positioned above the printed name.

Kevin P. Mulry

cc: Richard W. Mark, Esq.
Kathleen Miller, Esq.
Nancy Kestenbaum, Esq.
Michael Chertoff, Esq.